



May 5, 2005

Regional Supervisor, Field Operations
Attn: Ms. Karen Dunlap (MS 5230)
Minerals Management Service
1201 Elmwood Park Blvd
New Orleans, LA 70123

Re: Amended Initial DOCD (Control Number N-8407)
Atwater Valley Block 37; OCS-G 21826

Gentlemen:

Please find enclosed an amended initial Development Operations Coordination Document for the Merganser Project located in Atwater Valley Block 37. Complete copies of the amended plan have been provided for the ease of your review.

The following copies are enclosed:

<u>Proprietary</u>	<u>Public Information</u>
1 Paper Copy	1 Paper Copy
1 CDs	3 CDs

If you have any questions or need additional information, please contact me at 972-516-1177 or by e-mail at wanda.parker@wjpenterprises.com.

Very truly yours,

A handwritten signature in black ink that reads 'Wanda June Parker'.

Wanda June Parker, P. E.
Deepwater Regulatory Manager
Worldwide Facilities Engineering

Development Operations Coordination Document

Atwater Valley
Block 37
OCS-G 21826



May 5, 2005

Public Information



**Kerr-McGee Oil and Gas Corporation
Merganser Project
Atwater Valley Block 37; OCS-G 21826
Initial DOCD
May 5, 2005**

**Appendix A
Contents of Plan**

(A) Description, objectives and schedule

The reserves located in Atwater Valley Block 37 will be developed by producing two subsea wells, AT 37 SS001 and AT 37 SS003, tied back to the Anadarko operated Independence hub platform proposed to be installed in Mississippi Canyon (MC) 920. The two subsea wells will be tied back to the host platform by a right-of-way pipeline and associated lease term well jumpers and the wells will be controlled via an umbilical. Please see Anadarko's DOCD for AT 304 and 349 (Control Number N-8385) for information concerning the host platform. The two wells to be produced under this plan were previously drilled under an Exploration Plan, Control Number N-7225. They will be sidetracked to new bottomhole locations, completed, the subsea trees installed and shut-in under the Exploration Plan.

The Merganser reservoirs to be developed will be fully described in the Conservation Information Document prepared in accordance with NTL 2000-N05 that is planned to be submitted shortly.

The following is a tentative schedule of the development and production activities proposed as a part of this plan.

Activity	Start Date	End Date	Number of Days
Install lease term pipelines and umbilicals	September 1, 2006	September 10, 2006	10
Initiate production from 2 subsea wells	December 1, 2006		

(B) Location

The Merganser project is located in AT 37 approximately 120 nautical miles southeast of Venice, Louisiana. The surface location for the AT 37 SS001 was approved in the EP (N-7225) as Well Location D and AT 37 SS003 was approved as Well Location A. These locations were bathymetry map submitted with the EP. Plats showing the surface locations are attached. The lease term pipelines proposed to be laid as a part of this plan will connect the wells to the right-of-way pipeline which will transport the well product to the host platform in MC 920 for processing. The exact routing of the pipelines will be provided with the pipeline application.

The construction vessels to be utilized for the installation of the lease term pipelines are dynamically positioned with no associated anchors. In the event that an anchored vessel is proposed to be utilized, an anchor plan will be submitted to MMS for approval.



Kerr-McGee Oil and Gas Corporation
Merganser Project
Atwater Valley Block 37; OCS-G 21826
Initial DOCD
May 5, 2005

The host facility, the Independence hub, located in MC 920, is approximately 90 miles southeast of the Louisiana coastline and 150 miles south of the coast of Alabama. Please see Anadarko's DOCD N-8385 for additional details concerning the hub platform.

Please see the attached MMS-137 for a table showing the location of the subsea wells and the host facility.

(C) Drilling Unit

No drilling or completion activities are proposed as a part of this plan.

(D) Production Facilities

The host platform will be the proposed Anadarko operated Independence hub platform which will be located in MC 920. Please see Anadarko's DOCD N-8385 for more information concerning the host facility.

The subsea system including the well, subsea wellhead, subsea tree, control system, lease term pipelines and right-of-way pipelines will be fully described in the Deepwater Operations Plan required in NTL 2000-N06. Please see the attached drawings showing the relationship between the subsea trees and proposed lease term pipelines. The subsea equipment has been designed in accordance with established and accepted industry recommended practices and specifications. The subsea wellhead and tree have been designed and manufactured in accordance with API Spec 17D. The safety control system has been designed to allow the proper operation of the subsea well and to allow for the proper shut-in of production under various conditions. The safety system has been designed in accordance with the regulations in 30 CFR 250, API RP 14C and API RP 14H. The primary safety and pollution features built into the subsea system are:

- The MAOP of the flowline system is greater than the maximum shut-in tubing pressure (SITP) of the wells.
- The installation of Shutdown Valves (SDV) where the flowlines come on board the host facility which will close upon:
 - The detection of a flowline low-pressure signal (PSL) or a high-pressure signal (PSH) from the pressure transmitter located on the flowline upstream of the SDV.
 - A process upset shutdown (PSD) in the host facility
 - An emergency shutdown (ESD) on the host facility.
- The subsea pipelines are not located within a mud slide area.

Attachment A-1

U.S. Department of the Interior
Minerals Management Service

OMB Control Number: 1010-0049
OMB Approval Expires: August 31, 2006

OCS PLAN INFORMATION FORM

General Information											
Type of OCS Plan:		Exploration Plan (EP)				<input checked="" type="checkbox"/> Development Operations Coordination Document (DOCD)					
Company Name: Kerr-McGee Oil and Gas Corporation						MMS Operator Number: 02219					
Address: 16666 Northchase						Contact Person: Wanda Parker or Cary Bradford					
Houston, TX 77060						Phone Number: 972-516-1177 (WP) 281-673-6338 (CB)					
						E-Mail Address: wanda.parker@wjpenrprises.com					
Lease(s): OCS-G 21826				Area: AT		Block(s): 37		Project Name Merganser			
Objective(s):		<input type="checkbox"/> Oil	<input type="checkbox"/> Gas	<input type="checkbox"/> Sulphur	<input type="checkbox"/> Salt	Onshore Base: Fourchon LA			Distance to Closest Land (Miles): 90		
Description of Proposed Activities (Mark all that apply)											
<input type="checkbox"/>	Exploration drilling					<input type="checkbox"/>	Development drilling				
<input type="checkbox"/>	Well completion					<input type="checkbox"/>	Installation of production platform				
<input type="checkbox"/>	Well test flaring (for more than 48 hours)					<input type="checkbox"/>	Installation of production facilities				
<input type="checkbox"/>	Installation of caisson or platform as well protection structure					<input type="checkbox"/>	Installation of satellite structure				
<input type="checkbox"/>	Installation of subsea wellheads and/or manifolds					<input checked="" type="checkbox"/>	Commence production				
<input checked="" type="checkbox"/>	Installation of lease term pipelines					<input type="checkbox"/>	Other (Specify and describe)				
Have you submitted or do you plan to submit a Conservation Information Document to accompany this plan?								<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Do you propose to use new or unusual technology to conduct your activities?								<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Do you propose any facility that will serve as a host facility for deepwater subsea development?								<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Do you propose any activities that may disturb an MMS-designated high-probability archaeological area?								<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
Have all of the surface locations of your proposed activities been previously reviewed and approved by MMS?								<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Tentative Schedule of Proposed Activities											
Proposed Activity						Start Date		End Date		No. of Days	
Install Lease Term Pipelines						Sept 1, 2006		Sept 10, 2006		10	
Commence Production						Dec 1, 2006					
Description of Drilling Rig						Description of Production Platform--Existing					
<input type="checkbox"/>	Jackup		<input type="checkbox"/>	Drillship		<input type="checkbox"/>	Caisson		<input type="checkbox"/>	Tension leg platform	
<input type="checkbox"/>	Gorilla Jackup		<input type="checkbox"/>	Platform rig		<input type="checkbox"/>	Well protector		<input type="checkbox"/>	Compliant tower	
<input type="checkbox"/>	Semisubmersible		<input type="checkbox"/>	Submersible		<input type="checkbox"/>	Fixed platform		<input type="checkbox"/>	Guyed tower	
<input type="checkbox"/>	DP Semisubmersible		<input type="checkbox"/>	Other (Attach Description)		<input type="checkbox"/>	Subsea manifold		<input type="checkbox"/>	Floating production system	
Drilling Rig Name (If Known):						Spar				Other (Attach Description)	
Description of Lease Term Pipelines											
From (Facility/Area/Block)				To (Facility/Area/Block)				Diameter (Inches)		Length (Feet)	
Well SS001/AT 37				PLET/AT 37				6-in		50	
Well SS003/AT 37				PLET/AT 37				6-in		50	
PLET/AT 37				PLEM/AT 37				6-in		1600	

OCS PLAN INFORMATION FORM (CONTINUED)
Include one copy of this page for each proposed well/structure

Existing Proposed Well/Structure Location					
Well or Structure Name/Number (If renaming well or structure, reference previous name): AT 37 SS001 (Surface Location Approved EP N-72255 as Well D)					Subsea Completion
Anchor Radius (if applicable) in feet: NA					<div style="display: flex; justify-content: space-between; width: 100%;"> X Yes No </div>
	Surface Location		Bottom-Hole Location (For Wells)		
Lease No.	OCS-G 21826				
Area Name	Atwater Valley				
Block No.	37				
Blockline Departures (in feet)	N/S Departure: 7067 FSL				
	E/W Departure: 1115 FSL				
Lambert X-Y coordinates	X: 1,268,315				
	Y: 10,144,667				
Latitude/ Longitude	Latitude 27° 57' 02.393" N				
	Longitude -88° 09' 10.539" W				
	TVD (Feet):		MD (Feet):		Water Depth (Feet): 7919
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)-NA					
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor
			X =	Y =	
<p>Paperwork Reduction Act of 1995 Statement: The Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35) requires us to inform you that MMS collects this information as part of an applicant's Exploration Plan or Development Operations Coordination Document submitted for MMS approval. We use the information to facilitate our review and data entry for OCS plans. We will protect proprietary data according to the Freedom of Information Act and 30 CFR 250.196. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget Control Number. The use of this form is voluntary. The public reporting burden for this form is included in the burden for preparing Exploration Plans and Development Operations Coordination Documents. We estimate that burden to average 580 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, N.W., Washington, DC 20240.</p>					

OCS PLAN INFORMATION FORM (CONTINUED)
Include one copy of this page for each proposed well/structure

Existing Proposed Well/Structure Location					
Well or Structure Name/Number (If renaming well or structure, reference previous name): AT SS003 (Surface Location Approved in EP N-7225 as Well A)					Subsea Completion
Anchor Radius (if applicable) in feet: NA					<div style="display: flex; justify-content: space-between; width: 100%;"> X Yes No </div>
	Surface Location		Bottom-Hole Location (For Wells)		
Lease No.	OCS-G 21826				
Area Name	Atwater Valley				
Block No.	37				
Blockline Departures (in feet)	N/S Departure: 5470 FSL				
	E/W Departure: 564 FWL				
Lambert X-Y coordinates	X: 1,267,764.36				
	Y: 10,143,069.63				
Latitude/ Longitude	Latitude 27° 56' 46.521" N				
	Longitude -88° 09' 16.512" W				
	TVD (Feet):		MD (Feet):		Water Depth (Feet): 7933
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)-NA					
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor
			X =	Y =	
<p>Paperwork Reduction Act of 1995 Statement: The Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35) requires us to inform you that MMS collects this information as part of an applicant's Exploration Plan or Development Operations Coordination Document submitted for MMS approval. We use the information to facilitate our review and data entry for OCS plans. We will protect proprietary data according to the Freedom of Information Act and 30 CFR 250.196. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget Control Number. The use of this form is voluntary. The public reporting burden for this form is included in the burden for preparing Exploration Plans and Development Operations Coordination Documents. We estimate that burden to average 580 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, N.W., Washington, DC 20240.</p>					

OCS PLAN INFORMATION FORM (CONTINUED)
Include one copy of this page for each proposed well/structure

Host Platform Structure Location							
Well or Structure Name/Number (If renaming well or structure, reference previous name): Host Facility---Anadarko's Independence Hub (See DOCD N-8385 for Complete Details)					Subsea Completion		
Anchor Radius (if applicable) in feet:NA					<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">Yes</td> <td style="width: 50%; text-align: center;">No</td> </tr> </table>	Yes	No
Yes	No						
	Surface Location		Bottom-Hole Location (For Wells)				
Lease No.	Open						
Area Name	Mississippi Canyon						
Block No.	920						
Blockline Departures (in feet)	N/S Departure: 7920' FNL						
	E/W Departure: 7920 FEL						
Lambert X-Y coordinates	X: 1,322,640						
	Y: 10,193,040						
Latitude/ Longitude	Latitude N 28.08505618						
	Longitude W -87.98583928						
			Water Depth (Feet): 7900				
Anchor Locations for Drilling Rig or Construction Barge (If anchor radius supplied above, not necessary)-NA							
Anchor Name or No.	Area	Block	X Coordinate	Y Coordinate	Length of Anchor Chain on Seafloor		
			X =	Y =			
<p>Paperwork Reduction Act of 1995 Statement: The Paperwork Reduction Act of 1995 (44 U.S.C. Chapter 35) requires us to inform you that MMS collects this information as part of an applicant's Exploration Plan or Development Operations Coordination Document submitted for MMS approval. We use the information to facilitate our review and data entry for OCS plans. We will protect proprietary data according to the Freedom of Information Act and 30 CFR 250.196. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget Control Number. The use of this form is voluntary. The public reporting burden for this form is included in the burden for preparing Exploration Plans and Development Operations Coordination Documents. We estimate that burden to average 580 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, N.W., Washington, DC 20240.</p>							

S46° 09' 35"E 544,328.43'
From USC&GS Mon. "SW PASS LTHSE"

AT36

1,115'

7,067'

No 001 Prop Well Surf	
X=	1,268,315.00'
Y=	10,144,667.00'
Lat.	27° 57' 02.393"N
Lon.	88° 09' 10.539"W

AT37

OCS-G-21826

KERR-MCGEE

PUBLIC INFORMATION

GRID NORTH

I HEREBY CERTIFY THAT THE ABOVE PROPOSED
WELL LOCATION IS CORRECT.

Lionel J. Cormier
REG. PROFESSIONAL LAND SURVEYOR NO. 4401
STATE OF LOUISIANA



KERR-MCGEE OIL & GAS CORPORATION

PROPOSED LOCATION
OCS-G-21826 WELL #001

BLOCK 37
ATWATER VALLEY AREA
GULF OF MEXICO

JOHN E. CHANCE
& ASSOCIATES, INC.



GEODETC DATUM: NAD 1927
PROJECTION: U.T.M. 18
GRID UNITS: US SURVEY FEET

SCALE
IN FEET 0 2,000'

Job No.: 01-3353	Date: 10/04/01	Drwn: VAG	Chart: Of:
Dwgfile: O:\CAGBASE\WPERMIT\UTM16\AT\PERMIT\37P1			1 1

Printed: 10/4/01

AT36

AT37

OCS-G-21826

KERR-MCGEE

O1

S45° 59' 54"E 545,039.85'
From USC&GS Mon.
"SW PASS LIGHTHOUSE"

564.36'

No. 003 Final Well Surf.
X= 1,267,764.36'
Y= 10,143,069.63'
Lat. 27° 56' 46.521"N
Lon. 88° 09' 16.512"W

5,469.63'

GRID NORTH

BEST AVAILABLE COPY

I HEREBY CERTIFY THAT THE ABOVE FINAL
WELL SURFACE IS CORRECT.

NOTES:

1) SURVEYED COORDINATES TRANSFORMED
FROM NAD83 (GPS DATUM) TO NAD27
(CHART DATUM) USING NADCON
VERSION 2.1.

**PUBLIC
INFORMATION**



KERR-MCGEE OIL & GAS CORPORATION

FINAL LOCATION
OCS-G-21826 WELL NO. 003

BLOCK 37
ATWATER VALLEY AREA
GULF OF MEXICO

FUGRO CHANCE INC.



GEODETIC DATUM: NAD 1927
PROJECTION: U.T.M. 16
GRID UNITS: US SURVEY FEET

SCALE
IN FEET 0 2,000'

Job No.: 02-2604

Date: 9/6/02

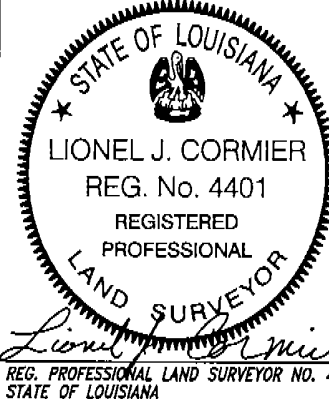
Drwn: RDT

Chart: Of:

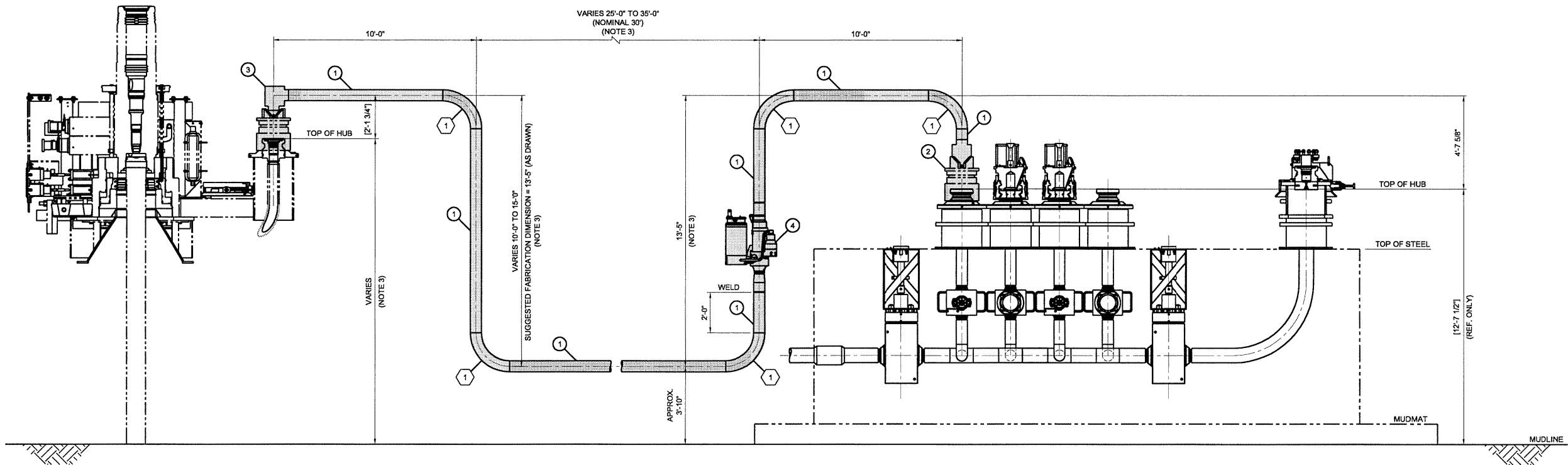
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1 1

Printed: 9/9/02

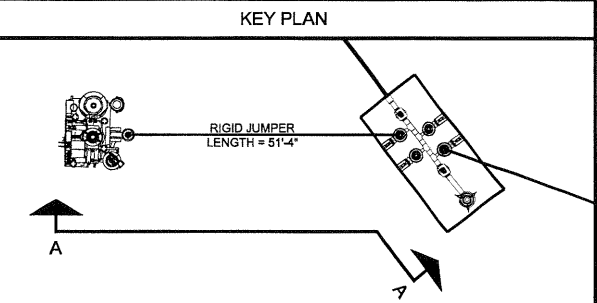


REG. PROFESSIONAL LAND SURVEYOR NO. 4401
STATE OF LOUISIANA



VIEW A-A

PLEM
(STRUCTURAL DETAILS TO BE PROVIDED BY FABRICATION CONTRACTOR)
(SHOWN OUT OF POSITION - REF. DWG. 1)



COMPANY SUPPLIED ITEMS (#)

ITEM	QTY	DESCRIPTION
1	100'-0" MAX	6 5/8" O.D. X 0.625" WT API 5L X65 SMLS PIPE (65 ksi YIELD) SMLS PIPE
2	1	MAX-8 CONNECTOR, PLET END, 6 5/8" x 0.719" W.T. BUTT WELD
3	1	MAX-8 CONNECTOR w/ ELBOW, TREE END, 6 5/8" x 0.719" W.T. BUTT WELD
4	1	WET GAS METER

CONTRACTOR SUPPLIED ITEMS (#)

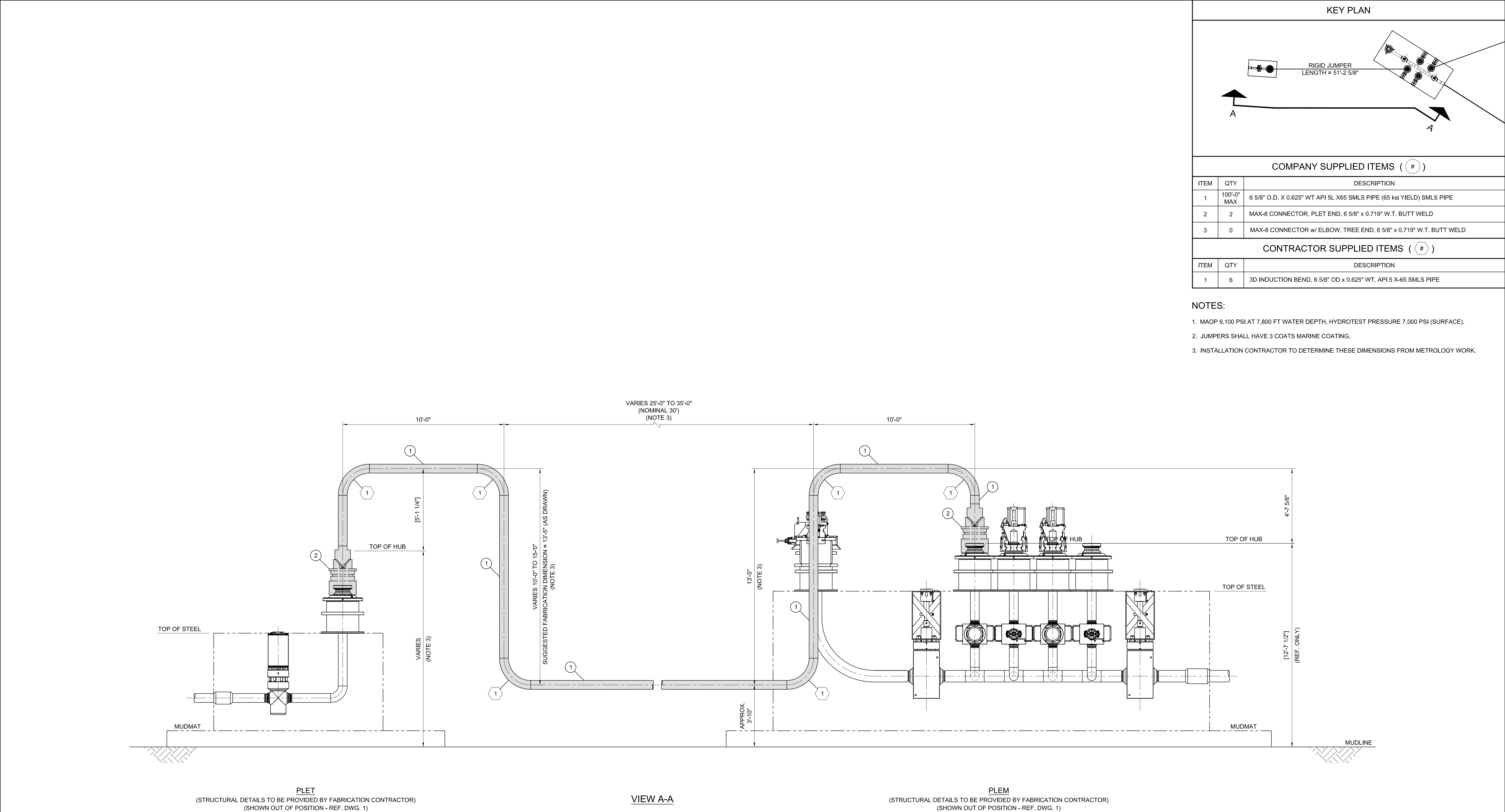
ITEM	QTY	DESCRIPTION
1	5	3D INDUCTION BEND, 6 5/8" OD x 0.625" WT, API 5L X-65 SMLS PIPE

NOTES:

1. MAOP 9,100 PSI AT 7,800 FT WATER DEPTH, HYDROTEST PRESSURE 7,000 PSI (SURFACE).
2. JUMPERS SHALL HAVE 3 COATS MARINE COATING.
3. INSTALLATION CONTRACTOR TO DETERMINE THESE DIMENSIONS FROM METROLOGY WORK.

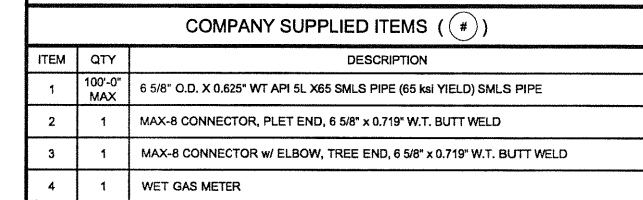
1
AT37 #1 MORGANSEER WELL
(SHOWN OUT OF POSITION - REF. DWG. 1)

[illegible]





PLET
(STRUCTURAL DETAILS TO BE PROVIDED BY FABRICATION CONTRACTOR)
(SHOWN OUT OF POSITION - REF. DWG 1)



CONTRACTOR SUPPLIED ITEMS (#)		
ITEM	QTY	DESCRIPTION
1	5	3D INDUCTION BEND, 6 5/8" OD x 0.625" WT, API 5 X-65 SMLS PIPE

NOTES:

1. MAOP 9,100 PSI AT 7,800 FT WATER DEPTH, HYDROTEST PRESSURE 7,000 PSI (SURFACE).
2. JUMPERS SHALL HAVE 3 COATS MARINE COATING.
3. INSTALLATION CONTRACTOR TO DETERMINE THESE DIMENSIONS FROM METROLOGY WORK

1		WELL #3 APPROACH DETAILS		3083-50-P-DW-005																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
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Appendix B

General Information

(A) Contact

Wanda June Parker
Kerr-McGee
16666 Northchase Dr
Houston, Texas 77060
972-516-1177
wanda.parker@wjpenenterprises.com or wparker@kmg.com

or

Cary Bradford
Kerr-McGee
16666 Northchase Dr
Houston, Texas 77060
281-673-6338
cbradford@kmg.com

(B) Project Name

Merganser

(C) Production Rates and Life of Reserves (Propriety Information)

(D) New or unusual technology

No new or unusual technology is being utilized for this project.

(E) Bonding Information

Kerr-McGee Oil & Gas Corp. has complied with the \$3,000,000 bond option as required by the Minerals Management Service in 30 CFR 256, Subpart I.

(F) Onshore base and support vessels

Existing onshore bases located in Venice, Louisiana and Fourchon, Louisiana will be utilized to support installation and production activities. Since the wells to be produced are subsea wells, no routine vessel trips are anticipated other than those to the host platform operated by Anadarko previously described in DOCD N-8385. During installation, travel routes used by vessels normally will be from the shore base directly to the installation site; however, from time to time this route may vary. Seven round trip vessel trips per week are anticipated during installation activities. The vessels to be utilized will be crew boats and/or workboats.



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The location of AT 37 and MC 920 in relation to the shoreline is shown on the Vicinity Map Attachment B1.

(G) Lease Stipulations

AT 37 is located within the Eglin Water Test Area 3 (EWTA-3). Kerr-McGee will contact the EWTA-3 prior to conducting operations in the lease block and if requested, enter into an agreement to provide for positive control of boats, ships and aircraft operating in the warning area. Further, Kerr-McGee recognizes that in the event the military conducts operations that could pose a danger to ongoing operations. They provide for evacuation of personnel and shut-in of operations during any event conducted by the military that could pose a danger to ongoing operations, evacuation and shut-in of operations in the area could be required. Therefore, Kerr-McGee will notify both the MMS and EWTA-3 prior to conducting operations and provide a contact to be notified if the terms of these stipulations are implemented.

(H) Related OCS Facilities and Operations

The proposed subsea wells will be tied back the proposed Independence hub to be operated by Anadarko in MC 920 via lease term and right-of-way pipelines. The pipelines have been designed to transport a maximum of 250 MMSCFD and 550 BCPD. The pipeline boarding shut down valve on the host platform will close within 45 seconds of being signaled to close. The subsea well will start its shutdown sequence immediately upon being signaled to close. The Production Isolation Valve and Choke will close immediately, effectively shutting off flow from the well, with the Production Wing Valve closing within 4 minutes of being signaled to close. The Production Master Valve will close within 20 minutes.

The production from the subsea wells will be separated and measured on the host platform. Please see DOCD N-8385 for additional information concerning the host platform.

(I) Transportation Information

From the host platform in MC 920, the production stream will enter a proposed 20" right-of-way gas and condensate export pipeline departing the platform for a proposed platform in West Delta 68 for ultimate delivery to shore.

REGIONAL MAP

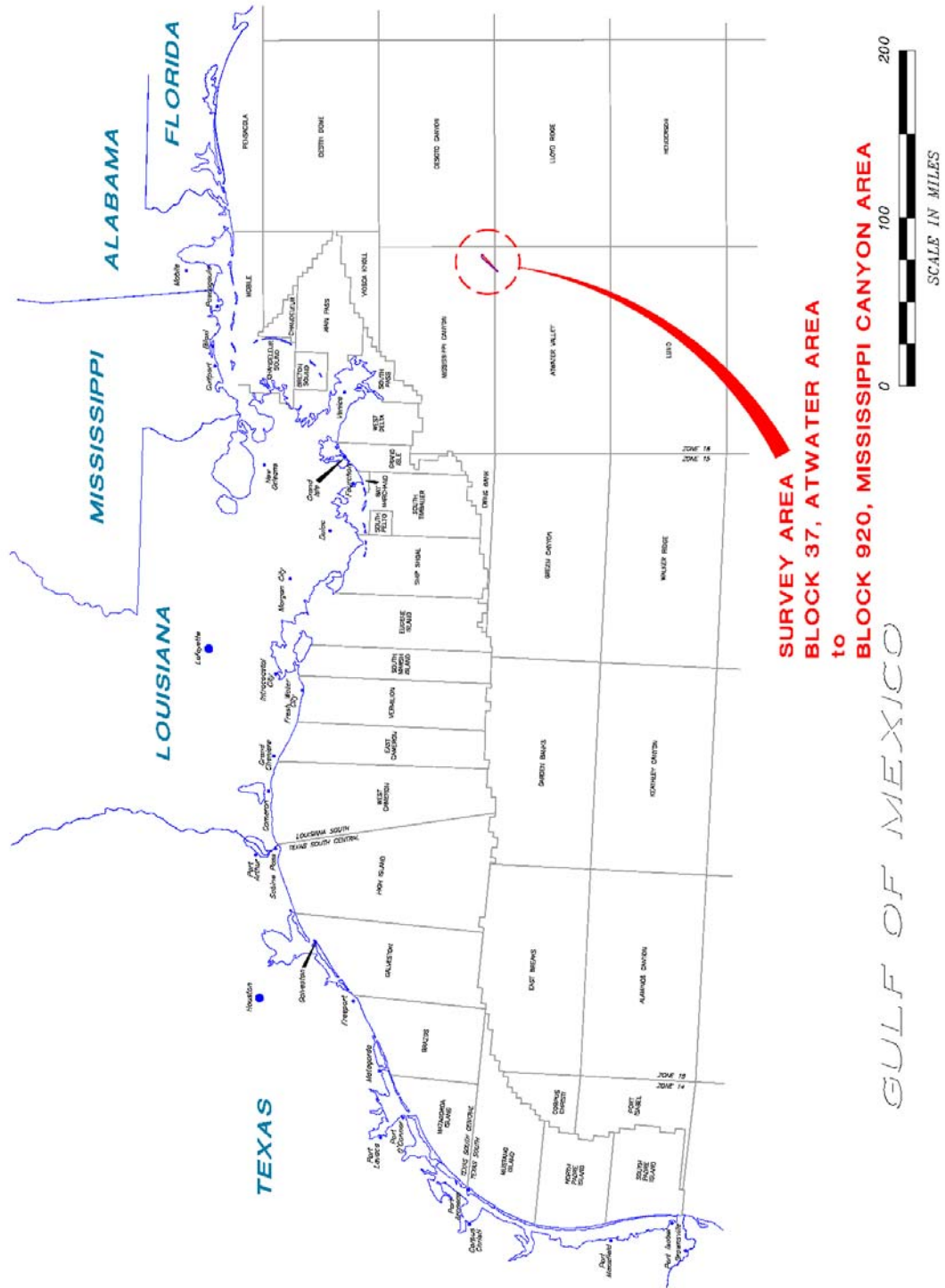


Figure 1-1. Regional Map showing the location of the proposed routes.



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Appendix C

Geological, Geophysical and H₂S Information

No new wells are planned to be drilled or completed as a part of this plan; therefore, only a structure contour map is being included with this plan. No seismic lines, geological structure cross sections, shallow hazards reports, shallow hazards assessment or high-resolution seismic lines have been submitted with this plan. The surface locations were previously approved in EP Control Number N-7225.

A shallow hazards assessment will be submitted with the lease term pipeline application.

A Conservation Information Document in accordance with NTL 2000-N05 will be submitted in conjunction with this DOCD under separate cover.

H₂S Information

No indications of H₂S have been found in any of the wells previously drilled in GC 768. In the previously approved EP, MMS has classified the area as “H₂S absent”. Therefore, it is requested that for this plan, MMS classify the area as “H₂S absent”.



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Appendix D

Biological Information

Chemosynthetic Information

No new wells are planned to be drilled or completed as a part of this plan. Chemosynthetic information was submitted with EP N-7225 for the wells which will be produced as a part of this plan.

The lease term flowline routing has not been finalized. A chemosynthetic statement will be included with the pipeline application.

Topographic Features Information

The locations of the wells and lease term pipelines proposed as a part of this plan are not located near an identified topographic feature.

Live Bottom (Pinnacle Trend) Information

The location of the wells and lease term pipelines proposed as a part of this plan are not located near an identified pinnacle trend.

Remotely Operated Vehicle (ROV) Surveys

Kerr-McGee is familiar with the requirements of NTL 2001-G04. Since no drilling is proposed as a part of this plan, no ROV surveys as required in NTL 2003-G03 are proposed to be conducted.



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Appendix E


Wastes and Discharges Information

(A) Discharges

Since the activities in this plan only include the installation of lease term pipelines and production operations from subsea wells, no new discharges associated with the activities proposed in this plan are anticipated other than those previously described by Anadarko in the DOCD N-8385 for the host facility.

(B) Disposed Waste

Since the activities in this plan only include the installation of lease term pipelines and production operations from subsea wells, no new waste disposals associated with the activities proposed in this plan are anticipated other than those previously described by Anadarko in the DOCD N-8385 for the host facility.

	<p style="text-align: right;">Kerr-McGee Oil and Gas Corporation Merganser Project Atwater Valley Block 37; OCS-G 21826 Initial DOCD May 5, 2005</p>
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Appendix F Oil Spill Response and Chemical Information

(A). Statement

Activities proposed in this DOCD will be covered by Kerr-McGee's approved Regional OSRP.

(B). OSRO information

Kerr-McGee's primary equipment provider is Clean Gulf Association (CGA). The Marine Spill Response Corporation (MSRC) STARS network will provide closest available personnel, as well as an MSRC supervisor to operate the equipment.

(C). Worst-case scenario comparison

Category	Regional OSRP	DOCD
Type of Activity	Production	Production
Facility Location (area/block)	Green Canyon 680	AT 37
Facility Designation	Platform A	Subsea Completion
Distance to Nearest Shoreline	120 miles	90 miles
Volume (bbls)		
-Storage tanks and flowlines	3,458	
-Lease Term Pipelines	1,700	
-Uncontrolled blowout (BPD)	15,000	60
Total Volume	20,128	60
Type of Oil	Crude	Condensate
API Gravity	30°	36.1°

Since Kerr-McGee Oil and Gas Corporation has the capability to respond to the worst case spill scenario included in its regional OSRP approved in May, 2004 (subsequently updated) and since the worst-case scenario determined for our DOCD does not replace the worst-case scenario in our regional OSRP, I hereby certify that Kerr-McGee has the capability to respond, to the maximum extent practicable, to a worst-case discharge, or a substantial threat of such a discharge, resulting from the activities proposed in our DOCD.

(A) Facility tanks, production vessels

No drilling rigs or surface facilities are proposed as a part of this plan. Please see paragraph (D) for information concerning the lease term pipeline installation vessels.

(B) Spill Response Sites

Primary Response Equipment Location	Preplanned Staging Location
Houma, LA	Houma, LA, Fort Jackson, LA



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(C) Diesel oil supply vessels

No diesel transfers are anticipated.

(D). Support vessels fuel tanks

Type of Vessel	Maximum Number in Field Simultaneously	Estimated maximum fuel tank storage capacity per vessel, Barrels
Pipeline Installation Vessels	2	9684
Workboat/crewboats	1	1425

(E). Produced Liquid Hydrocarbon Transportation Vessels

All produced liquids are planned to be transported by pipeline.

(F). Oil and Synthetic Based Drilling Fluids

No drilling is proposed as a part of this plan.

(G) Oils characteristics:

Not required since the proposed activities do not include the installation of a surface facility, are not located in either the Eastern Planning Area of the GOM or within the Protective Zones of the Flower Garden Banks and Stetson Bank.

(H) Blowout scenario

A potential blowout could occur during the well production activities. The most likely scenario would be after the well has been gravel packed and perforated and with 4.5 inch tubing in the hole during a workover. It is assumed the blowout would occur at the surface (not at the mudline). The two wells being produced in this plan are very dry gas wells (1 BC/MMCF). Should such a blowout occur, the initial highest estimated spill flow rate is 60 BCPD. If left uncontrolled, this rate would decrease as the reservoir pressure is drawn down or the formation collapses. If the well flowed at the maximum spill rate for 45 days (the time to drill a relief well), 2,700 barrels of condensate could be released.

At the first indications of loss of control, every attempt will be made using surface intervention to stop the blowout. In the event surface intervention such as closing the blowout preventors does not stop the flow, then well control specialists will be called to the location. It is expected they would arrive within a few hours of the blowout and they would assess the situation and attempt to stop the flow using surface intervention. It is anticipated that the well could be controlled using surface intervention techniques. In the meantime, preparations would be made to drill a relief well in the event that the well could not be controlled with surface intervention. There are several semi-submersibles and drill ships capable of drilling a relief well in these water depths (approximately 7900 feet); therefore, rig availability is not anticipated to be a problem. No special rig package constraints have been identified. It is estimated that a relief well could be



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drilled within 45 days. Please note that Kerr-McGee believes this scenario to be hypothetical and may or may not ever occur.

(I). Spill Response Discussion

In the event that a blowout such as described above in Item (H), Kerr-McGee would respond in accordance with our approved regional Oil Spill Response Plan. Kerr-McGee has contracted with Clean Gulf Associates (CGA) as the primary Oil Spill Removal Organization. On notification of the spill, Kerr-McGee would contact CGA and request a full mobilization of equipment. Kerr-McGee would also request permission to use dispersants. The primary staging area would be Houma, Louisiana. Other staging areas would be utilized as warranted. The Incident Management System would be used to manage the response effort. The Emergency Response Operations Center would be established at Kerr-McGee's Houston office, 16666 Northchase.

(J). Pollution Prevention Measures

Kerr-McGee believes that it has taken care to design the subsea development to prevent pollution in accordance with applicable regulations and recommended practices. In addition, Kerr-McGee believes that it's voluntarily implemented SEMP program provides measures for safety and pollution prevention that are beyond those required by regulation. Kerr-McGee has also installed a vapor recovery system to limit the amount of air emissions from the production vessels.

(K). FGBNMS Monitoring Plans

Not Applicable



Appendix G

Air Emission Information

Projected emissions for the first 10 years of the project life were calculated utilizing the MMS supplied spread sheets (MMS 139). The maximum rated capacity of the equipment associated with the activities proposed in this plan was utilized to calculate the emissions. The Complex Total Emissions are the same as the Plan Emissions since there are no existing facilities at this location. These calculations show that the total emissions for the project do not exceed the exemption levels.

Screening Questions for DOCD's	Yes	No
Is any calculated Complex Total (CT) Emission amount (in tons) associated with your proposed exploration activities more than 90% of the amounts calculated using the following formulas: $CT = 3400D^{2/3}$ for CO, and $CT = 33.3D$ for the other air pollutants (where D = distance to shore in miles)?		✓
Do your emission calculation include any emission reduction measures or modified emission factors?		✓
Does or will the facility complex associated with your proposed development and production activities process production from eight or more wells?		✓
Do you expect to encounter H ₂ S at concentrations greater than 20 parts per million (ppm)?		✓
Do you propose to flare or vent natural gas in excess of the criteria set forth under 250.1105(a)(2) and (3)?		✓
Do you propose to burn produced hydrocarbon liquids		✓
Are your proposed development and production activities located within 25 miles from shore?		✓
Are your proposed development and production activities located within 200 kilometers of the Breton Wilderness Area?	✓	

Peak Year Emissions (2006)

Air Pollutant	Plan Emission Amounts (tons)	Calculated Exemption Amounts (tons)	Calculated Complex Total Emission Amounts (tons)
Carbon monoxide (CO)	16.03	68282	16.03
Particulate matter (PM)	2.14	2997	2.14
Sulphur dioxide (SO₂)	9.81	2997	9.81
Nitrogen oxides (NO_x)	73.47	2997	73.47
Volatile organic compounds (VOC)	2.20	2997	2.20



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Air Emissions Spreadsheets are attached.

Contact Person

Wanda Parker

972-516-1177

wanda.parker@wjpenterprises.com

DOCD AIR QUALITY SCREENING CHECKLIST

OMB Control No. 1010-0049
OMB Approval Expires: August 31, 2006

COMPANY	Kerr-McGee
AREA	AT
BLOCK	37
LEASE	OCS-G 21826
PLATFORM	
WELL	SS001 and SS003
COMPANY CONTACT	Wanda Parker
TELEPHONE	00
REMARKS	

LEASE TERM PIPELINE CONSTRUCTION INFORMATION:		
YEAR	NUMBER OF PIPELINES	TOTAL NUMBER OF CONSTRUCTION DAYS
1999		
2000		
2001		
2002		
2003		
2004		
2005		
2006	3	10
2007		
2008		
2009		

AIR EMISSION CUMPUTATION FACTORS

Fuel Usage Conversion Factors	Natural Gas Turbines		Natural Gas Engines		Diesel Recip. Engine		REF.	DATE
	SCF/hp-hr	9.524	SCF/hp-hr	7.143	GAL/hp-hr	0.0483	AP42 3.2-1	4/76 & 8/84

Equipment/Emission Factors	units	PM	SOx	NOx	VOC	CO	REF.	DATE
NG Turbines	gms/hp-hr		0.00247	1.3	0.01	0.83	AP42 3.2-1& 3.1-1	10/96
NG 2-cycle lean	gms/hp-hr		0.00185	10.9	0.43	1.5	AP42 3.2-1	10/96
NG 4-cycle lean	0	0	0.00000	0	0	1.6	AP42 3.2-1	10/96
NG 4-cycle rich	gms/hp-hr		0.00185	10	0.14	8.6	AP42 3.2-1	10/96
Diesel Recip. < 600 hp.	gms/hp-hr	1	1.468	14	1.12	3.03	AP42 3.3-1	10/96
Diesel Recip. > 600 hp.	gms/hp-hr	0.32	1.468	11	0.33	2.4	AP42 3.4-1	10/96
Diesel Boiler	lbs/bbl	0.084	2.42	0.84	0.008	0.21	AP42 1.3-12,14	9/98
NG Heaters/Boilers/Burners	lbs/mmscf	7.6	0.593	100	5.5	84	AP42 1.4-1, 14-2, & 14-3	7/98
NG Flares	lbs/mmscf		0.593	71.4	60.3	388.5	AP42 11.5-1	9/91
Liquid Flaring	lbs/bbl	0.42	6.83	2	0.01	0.21	AP42 1.3-1 & 1.3-3	9/98
Tank Vapors	lbs/bbl				0.03		E&P Forum	1/93
Fugitives	lbs/hr/comp.				0.0005		API Study	12/93
Glycol Dehydrator Vent	lbs/mmscf				6.6		La. DEQ	1991
Gas Venting	lbs/scf				0.0034			

Sulfur Content Source	Value	Units
Fuel Gas	3.33	ppm
Diesel Fuel	0.4	% weight
Produced Gas(Flares)	3.33	ppm
Produced Oil (Liquid Flaring)	1	% weight

AIR EMISSION CALCULATIONS - FIRST YEAR

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL		CONTACT		PHONE	REMARKS						
Kerr-McGee	AT	37	OCS-G 21826		SS001 and SS003		Wanda Parker		0	#REF!						
OPERATIONS	EQUIPMENT	RATING	MAX. FUEL	ACT. FUEL	RUN TIME		MAXIMUM POUNDS PER HOUR					ESTIMATED TONS				
	Diesel Engines	HP	GAL/HR	GAL/D												
	Nat. Gas Engines	HP	SCF/HR	SCF/D												
	Burners	MMBTU/HR	SCF/HR	SCF/D	HR/D	DAYS	PM	SOx	NOx	VOC	CO	PM	SOx	NOx	VOC	CO
DRILLING	PRIME MOVER>600hp diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	PRIME MOVER>600hp diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	PRIME MOVER>600hp diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	BURNER diesel	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	AUXILIARY EQUIP<600hp diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS>600hp diesel(crew)	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS>600hp diesel(supply)	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS>600hp diesel(tugs)	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PIPELINE INSTALLATION	CDI Intrepid	16200	782.46	18779.04	24	10	11.42	52.38	392.51	11.78	85.64	1.37	6.29	47.10	1.41	10.28
	CDI MV	7070	341.481	8195.54	24	10	4.98	22.86	171.30	5.14	37.37	0.60	2.74	20.56	0.62	4.48
	PIPELINE BURY BARGE diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	SUPPORT VESSEL diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS>600hp diesel(crew)	4000	193.2	4636.80	12	10	2.82	12.93	96.92	2.91	21.15	0.17	0.78	5.81	0.17	1.27
	VESSELS>600hp diesel(supply)	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FACILITY INSTALLATION	DERRICK BARGE diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	MATERIAL TUG diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS>600hp diesel(crew)	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	VESSELS>600hp diesel(supply)	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PRODUCTION	RECIP.<600hp diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	RECIP.>600hp diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	SUPPORT VESSEL diesel	0	0	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	TURBINE nat gas	0	0	0.00	0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
	RECIP.2 cycle lean nat gas	0	0	0.00	0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
	RECIP.4 cycle lean nat gas	0	0	0.00	0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
	RECIP.4 cycle rich nat gas	0	0	0.00	0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
	BURNER nat gas	0	0.00	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	MISC.	BPD	SCF/HR	COUNT												
	TANK-	0			0	0				0.00				0.00		0.00
	FLARE-		0		0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
	PROCESS VENT-		0		0	0				0.00				0.00		0.00
	FUGITIVES-			0.0		0				0.00				0.00		0.00
	GLYCOL STILL VENT-		0		0	0				0.00				0.00		0.00
DRILLING	OIL BURN	0			0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WELL TEST	GAS FLARE		0		0	0		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
2006 YEAR TOTAL							19.22	88.18	660.73	19.82	144.16	2.14	9.81	73.47	2.20	16.03
EXEMPTION CALCULATION	DISTANCE FROM LAND IN MILES											2997.00	2997.00	2997.00	2997.00	68282.16
	90.0															

AIR EMISSION CALCULATIONS

OMB Control No. 1010-0049
OMB Approval Expires: August 31, 2006

COMPANY	AREA	BLOCK	LEASE	PLATFORM	WELL
Kerr-McGee	AT	37	OCS-G 21826		SS001 and SS003
Year	Emitted Substance				
	PM	SOx	NOx	VOC	CO
2006	2.14	9.81	73.47	2.20	16.03
2007	0.00	0.00	0.00	0.00	0.00
2008	0.00	0.00	0.00	0.00	0.00
2009	0.00	0.00	0.00	0.00	0.00
2010	0.00	0.00	0.00	0.00	0.00
2011	0.00	0.00	0.00	0.00	0.00
2012	0.00	0.00	0.00	0.00	0.00
2013	0.00	0.00	0.00	0.00	0.00
2014	0.00	0.00	0.00	0.00	0.00
2015	0.00	0.00	0.00	0.00	0.00
Allowable	2997.00	2997.00	2997.00	2997.00	68282.16



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Appendix H Environmental Impact Analysis

(A) Impact-producing factors (IPF's)

The worksheet provided by MMS below was utilized to identify the environmental resources that could be impacted by these IPFs. An "X" has been placed in the space under each IPF category associated with the proposed activities the may impact a particular environmental resource. For those cells which are footnoted, a statement has been provided below the table as to the applicability to the proposed operations, and where there may be any effect, provide an analysis of the effect.

ENVIRONMENTAL IMPACT ANALYSIS Worksheet

Environmental Resources	Impact Producing Factors (IPFs) Categories and Examples Refer to a recent GOM OCS Lease Sale EIS for a more complete list of IPFs					
	Emissions (air, noise, light, etc.)	Effluents (muds, cuttings, other discharges to the water column or seafloor)	Physical disturbances to the seafloor (rig or anchor emplacements, etc.)	Wastes sent to shore for treatment or disposal	Accidents (e.g., oil spills, chemical spills, H ₂ S releases)	Other IPFs you identify
Site-specific at Offshore Location						
Designated topographic features		(1)	(1)		(1)	
Pinnacle Trend area live bottoms		(2)	(2)		(2)	
Eastern Gulf live bottoms		(3)	(3)		(3)	
Chemosynthetic communities			X(4)		X	
Water quality					X	
Fisheries					X	
Marine mammals	X(8)				X(8)	
Sea turtles	X(8)				X(8)	
Air quality	X(9)					
Shipwreck sites (known or potential)			(7)			
Prehistoric archaeological sites			(7)			
Vicinity of Offshore Location						
Essential fish habitat					X(6)	
Marine and pelagic birds					X	
Public health and safety					(5)	
Coastal and Onshore						
Beaches					X(6)	
Wetlands					X(6)	
Shore birds and coastal nesting birds					X(6)	
Coastal wildlife refuges					X	
Wilderness areas					X	
Other Resources You Identify						



The numbers in parentheses refer to the footnotes on page 2 of this form.

Footnotes for Environmental Impact Analysis Matrix

1. Activities that may affect a marine sanctuary or topographic feature. Specifically, if the well or platform site or any anchors will be on the seafloor within the:
 - (a) 4-mile zone of the Flower Garden Banks, or the 3-mile zone of Stetson Bank,
 - (b) 1000-m, 1-mile or 3-mile zone of any topographic feature (submarine bank) protected by the Topographic Features Stipulation attached to an OCS lease;
 - (c) Essential Fish Habitat (EFH) criteria of 500 ft from any no-activity zone; or
 - (d) Proximity of any submarine bank (500 ft buffer zone) with relief greater than 2 meters that is not protected by the Topographic Features Stipulation attached to an OCS lease.
2. Activities with any bottom disturbance within a OCS lease block protected through the Live Bottom (Pinnacle Trend) Stipulation attached to an OCS lease.
3. Activities within any Eastern Gulf OCS block where seafloor habitats are protected by the Live Bottom (Low-Relief) Stipulation attached to an OCS lease.
4. Activities on blocks designated by the MMS as being in water depths 400 meters or greater.
5. Exploration or production activities where H₂S concentrations greater than 500 ppm might be encountered.
6. All activities that could result in an accidental spill of produced liquid hydrocarbons or diesel fuel that you judge would impact these environmental resources. If the proposed action is located a sufficient distance from a resource that no impact would occur, the EIA can note that in a sentence or two.
7. All activities that involve seafloor disturbances, including anchor emplacements, in any OCS block designated by the MMS as having high-probability for the occurrence of shipwrecks or prehistoric sites, including such blocks that will be affected that are adjacent to the lease block in which your planned activity will occur. If the proposed activities are located a sufficient distance from a shipwreck or prehistoric site that no impact would occur, the EIA can note that in a sentence or two.
8. All activities that you determine might have an adverse effect on endangered or threatened marine mammals or sea turtles or their critical habitats.
9. Production activities that involve transportation of produced fluids to shore using shuttle tankers or barges.

(b) Analysis: Footnoted Cells:

(1) Designated topographic features: There are no IPF's (including effluents, physical disturbances to the seafloor and accidents) from the proposed activities that could cause impacts to topographic features. The closest topographical feature (Sackett Bank) is located more than 100 miles away.



It is unlikely that an accidental surface or subsurface oil spill will occur from the proposed activities. Since the crests of designated topographical features in the northern Gulf are found below 10 m, concentrated oil from a surface spill is not expected to reach their sessile biota. Even if a subsurface spill were to occur very near a designated topographical feature, subsurface oil should rise to the surface, and any oil remaining at depth would probably be swept clear of the banks by currents moving around the banks. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(2) Pinnacle Trend area live bottoms: There are no IPF's (including effluents, physical disturbances to the seafloor and accidents) from the proposed activities that could cause impacts to the pinnacle trend area live bottoms. The closest pinnacle trend live bottom stipulated block is located approximately 90 miles away.

It is unlikely that an accidental surface or subsurface oil spill will occur from the proposed activities. Any surface oil spill resulting from the proposed action would likely have no impact on the biota of the pinnacle trend because the crests of these features are much deeper than 20 m. Even if a subsurface spill were to occur very near pinnacle trend live bottom areas, subsurface oil should rise in the water column, surfacing almost directly over the source location and thus not impact pinnacles. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(3) Eastern Gulf live bottoms: There are no IPF's (including effluents, physical disturbances to the seafloor, or potential accidents) from the proposed activities that could cause impact to Eastern Gulf live bottoms. The proposed activities are not located an Eastern Gulf OCS block. No impact due to proposed activities or accidents associated with the proposed activities.

It is unlikely that an accidental surface or subsurface oil spill will occur from the proposed activities. Any surface or subsurface oil spill resulting from the proposed action would not be expected to cause adverse Eastern Gulf live bottoms because the depth of the features and dilution of spills (by currents and/or quickly rising oil). The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(4) Chemosynthetic communities: The proposed activities will occur in deepwater (water depths of 400 meters or greater). Therefore, IPF's (including effluents, physical disturbances to the seafloor, or potential accidents) from the proposed activities have the potential to cause impacts to chemosynthetic communities should they be present. However, the proposed activities will be conducted in accordance with Appendix D of this plan. Accordingly, we have provided MMS with the required maps, analysis and statement(s) prepared using the guidance in Attachment B of NTL No. 2000-G20, "Deepwater Chemosynthetic Communities." Compliance with NTL No. 2000-G20 will ensure that features or areas that could support high-density chemo synthetic communities will not be impacted.



(5) Water Quality: Effluents and accidents from the proposed activities could potentially cause impacts to water quality. However, since all discharges will be made in accordance with a general National Pollutant Discharge Elimination System (NPDES) permit issued by the U. S. Environmental Protection Agency (USEPA), operational discharges are not expected to cause significant adverse impacts to water quality.

It is unlikely that an accidental oil spill will occur from the proposed activities. If a spill were to occur, the water quality of marine waters would be temporarily affected by the dissolved components and small oil droplets. Dispersion by currents and microbial degradation would remove the oil from the water column or dilute the constituents to background levels. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(6) Fisheries: An accidental oil spill that may occur as a result of the proposed action has the potential to cause some detrimental effects to fisheries. However, it is unlikely that an accidental surface or subsurface oil spill will occur from the proposed activities. If a spill were to occur in open waters of the OCS proximate to mobile adult finfish or shellfish, the effects would likely be sublethal and the extent of damage would be reduced to the capability of adult fish and shellfish to avoid a spill, to metabolize hydrocarbons, and to excrete both metabolites and parent compounds. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(7) Marine mammals: Marine mammals may be adversely impacted by several IPF's (including vessel traffic, noise, accidental oil spills, and loss of trash and debris), all of which could occur due to the proposed action. Chronic and sporadic sub-lethal effects could occur that may stress and/or weaken individuals of a local group or population and make them more susceptible to infection from natural or anthropogenic sources. Few lethal effects are expected from oil spill, chance collisions with service vessels and ingestion of plastic material. Oil spills of any size are estimated to be aperiodic events that may contact cetaceans. Disturbance (e.g. noise) may stress animals, weaken their immune systems and make them more vulnerable to parasites and diseases that normally would not be fatal.

The net result of any disturbance would depend on the size and percentage of the population affected, ecological importance of the disturbed area, environmental and biological parameters that influence an animal's sensitivity to disturbance and stress, and the accommodation time in response to prolonged disturbance (Geraci and St. Aubin, 1980). Collisions between cetaceans and ships could cause serious injury or death (Laist et al., 2001). Sperm whales are one of 11 whale species that are hit commonly by ships (Laist et al., 2001). Collisions between OCS vessels and cetaceans within the project area are expected to be unusual events.

(8) Sea turtles: IPF's that could impact sea turtles include vessel traffic, noise, trash and debris, and accidental oil spills. Small numbers of turtles could be killed or injured by chance collision



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with service vessels or by eating indigestible trash, particularly plastic items, accidentally lost from drill rigs, production facilities, and service vessels. Drilling rigs and project vessels produce noise that could disrupt normal behavior patterns and create some stress potentially making sea turtles more susceptible to disease. Oil spills and oil-spill-response activities are potential threats that could have lethal effects on turtles. Contact with oil, consumption of oil particles, and oil-contaminated prey could seriously affect individual sea turtles. Oil-spill-response planning and the habitat protection requirements of the Oil Pollution Act of 1990 should mitigate these threats. Kerr-McGee and its contractors will also follow the provisions of NTL 2003-G10 and NTL 2003-G11.

Most OCS-related impacts on sea turtles are expected to be sublethal. Chronic sublethal effects (e.g., stress) resulting in persistent physiological or behavioral changes and/or avoidance of effected areas could cause declines in survival or productivity, resulting in gradual population declines.

(9) Air Quality: There will be a limited degree of air quality degradation in the immediate vicinity of the proposed activities. Air quality analysis of the proposed activities indicated that the exemption level is not exceeded.

(10) Shipwreck sites (known or potential): There are no IPF's (including physical disturbances to the seafloor) from the proposed activities that could cause impacts to known or potential shipwreck sites. The proposed activities are not located in or adjacent to an OCS block designated by MMS as having high-probability for the occurrence of shipwrecks and review of the Shallow Hazards Report (submitted in accordance with NTL 2002-G08, Appendix C, and NTL 98-20) indicates that there are no known or potential shipwreck sites located within the survey area.

(11) Prehistoric archaeological sites: There are no IPF's (including physical disturbances to the seafloor) from the proposed activities that could cause impacts to prehistoric archaeological sites. This is because the proposed activities are not located in or adjacent to an OCS block designated by MMS as having high-probability for the occurrence of prehistoric archaeological sites.

Vicinity of Offshore Location

(1) Essential fish habitat: An accidental oil spill that may occur as a result of the proposed action has the potential to cause some detrimental effects on essential fish habitat. However, it is unlikely that an accidental surface or subsurface oil spill would occur from the proposed activities. If a spill were to occur in open waters of the OCS proximate to mobile adult finfish or shellfish, the effects would likely be sublethal and the extent of damage would be reduced to the capability of adult fish and shellfish to avoid a spill, to metabolize hydrocarbons, and to excrete both metabolites and parent compounds. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.



(2) Marine and pelagic birds: An accidental oil spill that may occur as a result of the proposed action has the potential to impact marine and pelagic birds—birds could become oiled. However, it is unlikely that an accidental oil spill will occur from the proposed activities. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(3) Public health and safety due to accidents: There are no IPF's (including an accidental H₂S release) from the proposed activities that could cause impacts to public health and safety.

In accordance with 20 CFR 150.417(c) and Appendix C of this plan, sufficient information has been submitted to justify our request that the area of our proposed activities be classified by MMS as H₂S absent.

Coastal and Onshore

(1) Beaches: An accidental oil spill from the proposed activities could cause impacts to beaches. However, due to the distance from shore (90 miles) and the response capabilities implemented, no significant adverse impacts are expected. Both the historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(2) Wetlands: An accidental oil spill from the proposed activities could cause impacts to wetlands. However, due to the distance from shore (90 miles) and the response capabilities implemented, no significant adverse impacts are expected. Both the historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(3) Shore birds and coastal nesting birds: An accidental oil spill from the proposed activities could cause impacts to shore birds and coastal nesting birds. However, due to the distance from shore (90 miles) and the response capabilities implemented, no significant adverse impacts are expected. Both the historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(4) Coastal wildlife refuges: An accidental oil spill from the proposed activities could cause impacts to coastal wildlife refuges. However, due to the distance from shore (90 miles) and the response capabilities implemented, no significant adverse impacts are expected. Both the



historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

(5) Wilderness areas: An accidental oil spill from the proposed activities could cause impacts to wilderness areas. However, due to the distance from shore (90 miles) and the response capabilities implemented, no significant adverse impacts are expected. Both the historical spill data and the combined trajectory/risk calculations referenced in the publication OCS EIS/EA MMS 2002-052 indicate there is little risk of contact or impact to the coastline and associated environmental resources. The activities proposed in this plan will be covered by our regional OSRP as discussed in Appendix F of this plan.

Other Environmental Resources Identified

None

(C) Impacts on your proposed activities: The site specific environmental conditions have been taken into account for the proposed activities. No adverse impacts are expected on the proposed activities from site-specific environmental conditions.

Shallow Hazards reports were submitted in accordance with Appendix C of this plan and NTL 98-20. A Shallow Hazards Assessment of the any seafloor and subsurface geological and manmade features and conditions that may adversely affect operations was submitted in accordance with Appendix C of this plan and NTL 98-20.

(D) Alternatives: No studies were conducted to reduce the potential environmental impacts of the proposed activity.

(E) Mitigation measures: No mitigation measures other than those required by regulation are being employed.

(F) Consultation: No agencies or persons were consulted regarding potential impacts associated with the proposed activities.

(G) References:

Although not always cited, the following were utilized in preparing the EIA:

Geraci, J.R. and D.J. St. Aubin. 1980. Offshore petroleum resource development and marine mammals: a review and research recommendations. Marine Fisheries Review 42:1-12.

Kerr-McGee, Exploration Plan AT 37/38, 2001 (N-07225)



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Laist, D.W., A.R. Knowlton, J.G. Mead, A.S. Collet, and M. Podesta. 2001. Collisions between ships and whales. Mar. Mamm. Sci. 17:35-75.

U.S. Dept. of the Interior. Minerals Management Service. 2001, Grid 7 Environmental Assessment.

U. S. Dept of the Interior. Minerals Management Service 2001, Grid 10 Environmental Assessment.

U. S. Dept of the Interior. Minerals Management Service 2002, OCS EIS/EA MMS 2002-052, Gulf of Mexico OCS Oil and Gas Lease Sales: 2003-2007, Central Planning Area Sales 185, 190, 194, 198, and 201; Western Planning Area Sales 187, 192, 196, and 200; Final Environmental Impact Statement, Volume I: Chapters 1-10; Volume II: Figures and Tables.



Appendix I

COASTAL ZONE MANAGEMENT

(A) Consistency certification

Consistency certification has been provided for Alabama and Louisiana. See attached.

(B) Other information

Alabama:

A detailed description of the proposed activity, its associated facilities, the coastal effects and comprehensive data and information sufficient to support the consistency certification is provided in the DOCD. Information specifically identified in the State's management program as required data and information has been provided in the DOCD.

An evaluation that includes a set of findings, relating the coastal effects of the proposed activities to Alabama's relevant enforceable policies of the State's management program which has been provided to MMS is found below.

Coastal Resource Use Policies

1. Coastal Development

The activities proposed in this plan are located approximately 150 miles from the nearest Alabama shoreline and approximately 110 miles from the shorebase in Venice, Louisiana. Kerr-McGee does not anticipate that the operations proposed in this plan will impact or the need to pursue coastal development activities in Alabama at this time.

2. Mineral Resource Exploration and Extraction

Kerr-McGee does not propose to extract solid minerals from the State of Alabama as a part of this plan. These activities provide for the development of oil and gas hydrocarbons in the OCS Federal Waters in the Gulf of Mexico approximately 150 miles from the nearest Alabama shoreline.

3. Commercial Fishing

Alabama's Coastal Area Management Program encourages the protection and enhancement of the water quality and wetland resources of its coastal area in order to protect and enhance the aquatic resources and to identify, expand and enhance existing essential habitat in an effort to extend the productivity of the ecosystem. The activities proposed as a part of this plan will be located approximately 150 miles from the nearest shoreline in Alabama. No dredging and/or spoil deposition is proposed as a part of this plan. No drilling activities or surface facilities are proposed as a part of this plan and since this is a subsea well development, there will not be any routine effluent discharges. In the event of a condensate spill, Kerr-McGee will respond as planned in our Regional Oil Spill Response Plan and will address any potential impacts from spills on Alabama's coastal zone. Kerr-McGee's



development activities proposed in this plan are consistent with Alabama's enforceable policies for the protection and preservation of the coastal areas and marine life.

4. Hazard Management

Alabama's Coastal Area Management Program encourages land-use planning that avoids or eliminates development in hazardous coastal areas prone to loss due to flood, hurricane surge and/or erosion. The activities proposed in this plan are located approximately 150 miles from the nearest Alabama shoreline and should not impact Alabama's measures to protect the coastal area from natural hazards. We have adopted industry standards for conducting the proposed development operations; therefore, a spill event or blowout is unlikely. Response to such events will be responded to as quickly as possible through the implementation of our Regional Oil Spill Response Plan. Kerr-McGee does not propose or anticipate the need to develop any coastal/onshore sites which could have an adverse effect.

5. Shoreline Erosion

Kerr-McGee will be utilizing existing shore bases in Venice and Fourchon, Louisiana and does not propose any construction or development, dredging or filling activities on Alabama's lands or waters. All travel routes to and from the shore base and the offshore location in AT 37 will avoid any recreational trail systems as established by the State of Alabama. Therefore, the proposed development activities proposed in this plan are consistent with the enforceable policies of this chapter.

6. Recreation

Kerr-McGee will be utilizing existing shore bases in Venice and Fourchon, Louisiana and will utilize the most direct travel route between the shore base and AT 37 and will avoid recreational systems established by the State of Alabama. We have adopted industry standards for conducting the proposed development operations; therefore, a spill event or blowout is unlikely. Response to such events will be responded to as quickly as possible through the implementation of our Regional Oil Spill Response Plan. Kerr-McGee's operational procedures along with those outlined in our Regional Oil Spill Response Plan are considered constituent with Alabama's enforceable policies to protect and maintain Alabama's land and water areas for outdoor recreation, conservation and wildlife management.

7. Transportation

No adverse impact to the Alabama transportation system is anticipated due to the activities proposed in this plan since shorebases in Venice and Fourchon, Louisiana are proposed to be utilized.

Natural Resources Protection Policy

1. Biological Productivity



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The activities proposed in this plan are located approximately 150 miles south of Alabama's shoreline and approximately 110 miles from the nearest shorebase in Venice, Louisiana proposed to be utilized. No adverse impacts to the biological productivity of the coastal area and/or coastal resources due to the activities proposed in this plan are anticipated.

2. Water Quality

No dredging and/or spoil deposition is proposed as a part of this plan. No drilling activities or surface facilities are proposed as a part of this plan and since this is a subsea well development, there will not be any routine effluent discharges. In the event of a condensate spill or well blowout, Kerr-McGee will respond as quickly as possible in accordance with our Regional Oil Spill Response Plan. Kerr-McGee believes the activities proposed in this plan are consistent with Alabama's enforceable policies to conserve surface and ground waters of the State.

3. Water Resources

The activities proposed in this plan are located approximately 150 miles south of Alabama's shoreline and approximately 110 miles from the nearest shore base in Venice, Louisiana proposed to be utilized. No permanent installations are proposed in this plan which may have an impact on area runoff in coastal waters.

4. Air Quality

Air emissions associated with the proposed activities in Atwater Valley 37 have been projected using a matrix and formula supplied by the Minerals Management Service who has primacy from the Environmental Protection Agency for regulating such emissions. The resultant emissions are below the exemption levels for Carbon Monoxide, Particulate Matter, Sulphur Oxides, Nitrogen Oxides and Volatile Organic Compounds.

5. Wetlands and Submerged Grassbeds

The activities proposed in this plan are located approximately 150 miles south of Alabama's shoreline and approximately 110 miles from the nearest shore base in Venice, Louisiana proposed to be utilized. No adverse impacts to Alabama's wetlands and submerged grassbed's are anticipated due to activities proposed in this plan.

6. Beach and Dune Protection

The activities proposed in this plan are located approximately 150 miles south of Alabama's shoreline and approximately 110 miles from the nearest shorebase in Venice, Louisiana proposed to be utilized. No adverse impact on Alabama's coastal areas are anticipated due to the activities proposed in this plan. We have adopted industry standards for conducting the proposed development operations; therefore, a spill event or blowout is unlikely. Response to such events will be responded to as quickly as possible through the implementation of our Regional Oil Spill Response Plan. Kerr-McGee's operational procedures along with those outlined in our Regional Oil Spill Response Plan are considered



constituent with Alabama's enforceable policies to protect and conserve Alabama's beach and shore.

7. Wildlife Habitat Protection

No adverse impacts to Alabama's wildlife habitats are anticipated due to the activities proposed in this plan since shore bases in Venice and Fourchon, Louisiana are proposed to be utilized. The most direct route from the shore bases to AT 37 will be utilized. No drilling operations or surface facilities are proposed as a part of this plan. Kerr-McGee's operational procedures along with those outlined in our Regional Oil Spill Response Plan are considered constituent with Alabama's enforceable policies to conserve Alabama's wildlife resources, including endangered and/or threatened species.

8. Endangered Species

The activities proposed in this plan are located approximately 150 miles from the Alabama shoreline; therefore, Kerr-McGee does not anticipate an adverse impact to any endangered species.

9. Cultural Resources Protection

The proposed activities in AT 37 are located within a low probability area for potential archaeological resources; therefore, we do not anticipate any adverse impacts due to the activities proposed in this plan.

Louisiana:

A detailed description of the proposed activity, its associated facilities, the coastal effects and comprehensive data and information sufficient to support the consistency certification is provided in the DOCD. Information specifically identified in the State's management program as required data and information has been provided in the DOCD. All of Louisiana's relevant enforceable policies were considered in certifying consistency.

The following assurance of compliance with existing Federal and State laws, regulations and resultant enforceable program policies in Louisiana's CZMP is provided:

The proposed activity will be carried out and completed with the guarantee that: The best available and safest technologies will be used throughout the project. These include meeting all applicable requirements for equipment types, general project layout, safety systems, and equipment and monitoring systems. All operations will be covered by an approved oil spill response plan. All applicable Federal, State and local requirements regarding air emissions and water quality and discharge for the proposed activities, as well as any other permit conditions, will be complied with.



Kerr-McGee Oil and Gas Corporation
Merganser Project
Atwater Valley Block 37; OCS-G 21826
Initial DOCD
May 5, 2005

**COASTAL ZONE MANAGEMENT
CONSISTENCY CERTIFICATION**

Development Operations Coordination Document

Atwater Valley Block 37

OCS-G 21826

The proposed activities described in detail in this Plan comply with the State of Alabama approved Coastal Management Program and will be conducted in a manner consistent with such Program

Kerr-McGee Oil and Gas Corporation

A handwritten signature in black ink, appearing to read 'Cary V. Bradford', is written over a horizontal line.

Cary V. Bradford

April 28, 2005



Kerr-McGee Oil and Gas Corporation
Merganser Project
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Cary V. Bradford

April 28, 2005